

response date were sought in response to the first five motions to dismiss but not the sixth motion (FSCLE would have sought additional pages and slightly more time to pull in the sixth motion), there exists some confusion as to the date of FSCLE's response to Defendants' Motion to Dismiss [Dkt. #120]. FSCLE does not intend to take the full page limits afforded an ordinary response to a motion to dismiss. Consistent with an omnibus response, FSCLE will only address new or additional arguments in its response to Motion to Dismiss [Dkt. #120]. However, FSCLE respectfully asks for the additional week to respond to this later filed motion.

Defendants John Goodman, Jody Goodman and Jonathan Goodman consented to the requested additional time but simply asked that their reply date be extended because one or more of their attorneys were going on vacation in August around the date when a reply would otherwise be due. FSCLE consents to the additional time on the reply to accommodate opposing counsel's vacation schedule.

WHEREFORE, FSCLE respectfully submits that its date to respond to Motion to Dismiss [Dkt. #120] be set as August 2, 2024 and Defendant John Goodman's, Jody Goodman's and Jonathan Goodman's reply date be set as August 23, 2024.

BUTLER SNOW LLP

By: /s/ Daniel W. Van Horn
DANIEL W. VAN HORN (Pro Hac Admitted)
S. KEENAN CARTER (TX Bar No. 24006966)
R. CAMPBELL HILLYER (Pro Hac Admitted)
ADAM M. LANGLEY (Pro Hac Admitted)
KATHERINE KUCHENBECKER (Pro Hac
Admitted)
6075 Poplar Ave., Ste. 500
Memphis, TN 38119
(901) 680-7200
(901) 680-7201 (fax)
Danny.VanHorn@butlersnow.com
Keenan.Carter@ButlerSnow.com

Cam.Hillyer@butlersnow.com
Adam.Langley@butlersnow.com
Katherine.Kuchenbecker@butlersnow.com

SAYLES LAW FIRM
RICHARD A. SAYLES
Texas Bar No. 17697500
dsayles@sayleslawfirm.com
5600 W. Lovers Lane, Suite 116-363
Dallas, Texas 75209
(214) 643-8030 (Telephone)

FEDERAL EXPRESS CORPORATION
JASON R. BERNHARDT
Texas Bar No. 24045488
jasonbernhardt@fedex.com
3620 Hacks Cross Road, Building B
Memphis, Tennessee 38125
(901) 434-3213 (Telephone)
(901) 434-9279 (Fax)

**COUNSEL FOR PLAINTIFF FEDEX SUPPLY
CHAIN LOGISTICS & ELECTRONICS, INC.**

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing motion has been served on all counsel of record via the Court's CM/ECF system this the 25th day of July 2024.

By: /s/ Daniel W. Van Horn

CERTIFICATE OF CONFERENCE

Pursuant to Local Rule 7.1(b), on July 25, 2024, I conferred with David Skeels, attorney for John Goodman, Jody Goodman and Jonathan Goodman concerning this motion. Provided that their reply date be set as August 23, 2024, they consented to the requested extension of time to respond to their motion to dismiss.

Dated: July 25, 2024.

By: /s/ Daniel Van Horn

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

FEDEX SUPPLY CHAIN LOGISTICS)	
& ELECTRONICS, INC.,)	
)	
Plaintiff,)	
)	Civil Action No. 3:23-cv-02397
v.)	
)	
JAMES E. GOODMAN, JR., <i>et al.</i> ,)	
)	
Defendants.)	

**ORDER GRANTING
PLAINTIFF’S UNOPPOSED MOTION FOR ADDITIONAL TIME**

It appearing to the Court that Plaintiff’s Motion for Additional Time is well taken and should be GRANTED, it is hereby ORDERED that:

- (a) Plaintiff’s deadline to respond to Defendants’ Motion to Dismiss [Dkt. #120] shall be August 2, 2024; and
- (b) Defendant John Goodman’s, Jody Goodman’s and Jonathan Goodman’s deadline to file a reply brief, if any, shall be August 23, 2024.

It is so ORDERED this the _____ day _____, 2024.

HONORABLE KAREN GREN SCHOLER
UNITED STATES DISTRICT JUDGE